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FILED IN:

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY, CAMDEN,  
NEW JERSEY

ROBERT C. DALTON, individual,

Plaintiff,

V.

TANJU KARANFIL, an individual, JAMES P. CLEMENTS,  
an individual, CLEMSON UNIVERSITY,  
a South Carolina Corporation, and ET AL.,

Defendants

CIVIL COMPLAINT

CIVIL SUIT FILING FOR DAMAGES FOR CONSPIRACY AGAINST CIVIL RIGHTS, LIBEL AND  
SLANDER, PERSONAL INJURY, MALICIOUS INJURY TO PERSONAL PROPERTY, CONSPIRACY FOR  
THE PURPOSE OF ACCOMPLISHING LAWFUL OBJECT BY UNLAWFUL MEANS, AND  
CONSPIRACY FOR ACCOMPLISHING UNLAWFUL OBJECT. THE PLAINTIFF SEEKS ACTUAL  
DAMAGES FOR \$62 MILLION, NON-ECONOMIC DAMAGES FOR \$25 MILLION AND PRAYS FOR  
PUNITIVE DAMAGES. THE PLAINTIFF SEEKS TOTAL DAMAGES IN THE SUM OF \$87 MILLION  
PLUS THE PLAINTIFF PRAYS FOR \$10 MILLION IN PUNITIVE DAMAGES

**DELIVERY METHOD:** Personal Delivery by the Plaintiff

**FILED WITH:** Clerk of the Court  
U.S. District Court;  
District of New Jersey  
H. Cohen Building  
& U.S. Courthouse  
4th & Cooper Streets  
Camden, NJ 08101  
856-757-5021

**FILED BY:** Robert Carl Dalton  
 24 Maryland Rd  
 45 Little Egg Harbor Twp., NJ 08087  
 Phone: 609-879-9699  
 E-mail: rca.dalton@gmail.com

This Civil Complaint for the following crimes committed against the South Carolina Code of  
 50 Laws: **Sections 16-5-10; 16-6-20; 16-7-150; 16-11-510; and 16-17-410. And, with no deference  
 to Section 59-119-160 (4)(a)**

This Civil Complaint is filed against the two individuals and a South Carolina Corporate entity as  
 list herewithin in accordance to SC Code Section 59-119-60. Furthermore, there are other  
 55 individuals who may have that may have contributed to one or more of the crimes mentioned  
 above because of these other individuals had a relationship, in one form or another, with  
 Robert Carl Dalton and ESTEC Technology Works, LLC. Investigation into these other individuals  
 for their role in the crimes in this complaint and possible other crimes related to the complaint  
 needs to be carried out.

60 The actions of individuals and the corporate entity are described herewithin and this civil  
 complaint may be amended in the future and other supporting information may be  
 forthcoming. The following crimes are believed to have to be committed and deserve  
 prosecution, especially those individuals who State employment position requires strong ethics  
 65 and character.

**KNOWN ADDRESSES OF INDIVIDUALS AND ENTITIES WHOM THIS COMPLAINT IS FILED  
 AGAINST:**

70 A. Dr. Tanju Karanfil,  
 Vice President of Research,  
 Clemson University  
 230 Kappa Street; Clemson, South Carolina 29634  
 Phone: 864-656-7701; E-mail: [tkaranfi@clemson.edu](mailto:tkaranfi@clemson.edu)  
 75 Clemson University Compensation: appr. \$278,091 (State Salary)

B. Dr. James P. Clements,  
 President  
 Clemson University  
 80 201 Sikes Hall  
 Clemson, South Carolina 29634  
 Phone: 864-656-3413  
 E-mail: [president@clemson.edu](mailto:president@clemson.edu)  
 Clemson University Compensation: appr. \$801,330 (State Salary of \$312,530 and  
 85 \$488,800 by Clemson University Foundation)

C. Clemson University

201 Sikes Hall

Clemson, South Carolina 29631

90 Contact: Chairman E. Smyth McKissick III, Clemson University Board of Trustees

Note 1: Salaries were listed to show the level of responsibility each individual has, yet the willfully intend to injury and harm Robert Carl Dalton and ESTEC Technology Works, LLC.

95 Note 2: Robert Carl Dalton is disabled for at moderate to severe traumatic brain injury (TBI) by the State of New Jersey. Robert C. Dalton is Managing Partner of ESTEC Technology Works, LLC, and Robert Carl Dalton currently owns 100% of the Stock of ESTEC Technology Works, LLC. Robert Carl Dalton is the sole representative, sole member and only representative ESTEC Technology Works, LLC.

100

Under the Federal Law, the Americans with Disabilities Act (ADA), Robert Carl Dalton requests "reasonable accommodations" under the Americans with Disabilities Act. The requested "reasonable accommodations" include more time to file, to act and to response to Court practices. Typically, Robert Carl Dalton needs twice the allotted time or more to file , to act, 105 and to respond. Furthermore, Robert Carl Dalton communicates with circumstantial and tangential means in his writing and speaking which can also be accompanied with non-threatening emotional dysregulation, dyslexia, ADD, and dysgraphia. Often, Robert Carl Dalton can experience cognitive overload which can have negative effects on his executive functions and cause extreme fatigue, mentally and physically. Moreover, Robert Carl Dalton has a severe 110 photophobia which is wavelength specific (color of light).

Furthermore, Robert Carl Dalton has had two subsequent concussive events since being disabled for a TBI; These two concussive events occurred in December 2017 and March 2019. Robert Carl Dalton is currently being treated for injuries sustained in these events and for 115 original TBI injuries exacerbated by these events. Therefore, SC Code Section 15-3-40, 15-3-50, and 15-3-60 may apply to Robert C. Dalton.

**THE CIVIL COMPLAINT SPECIFICS:**

**1. South Carolina Code 16-5-10 Conspiracy Against Civil Rights:**

120

"It is unlawful for two or more persons to band or conspire together or go in disguise upon the public highway or upon the premises of another with the intent to injure, oppress, or violate the person or property of a citizen because of his political opinion or his expression or exercise of the same or attempt by any means, measures, or acts to hinder, prevent, or obstruct a citizen in the free exercise and enjoyment of any right or privilege secured to him by the Constitution and laws of the 125 United States or by the Constitution and laws of this State.

**The following individuals and entity broke SC Code 16-5-10 as briefly described as follows.**

Dr. Tanju Karanfil, Dr. James P. Clements, Clemson University (CU) [a.k.a. herein collectively

referred to as "THE TRANSGRESSORS], and possibly others as listed and discussed hereinafter [a.k.a. herein collectively referred to as "THE OTHERS"] and possibly active participants [a.k.a. herein collectively as "ACTIVE PARTICIPANTS" banded and conspired together with the intent to injury, to oppress, to harm and to prevent Robert Carl Dalton and his property, ESTEC Technology Works, LLC, (ETW) [a.k.a. herein collectively referred to as "DALTON/ETW"] from exercising and enjoying DALTON/ETW's civil rights secured to "DALTON/ETW" as their rights under Title 46, Chapter 55 "Industrial Hemp Cultivation"; Section 46-55-20 "Industrial Hemp Program; research; permits; regulations"; Part(2).

*Part (2) reads as follows:*

*"Industrial hemp is an agricultural crop. Any public institution of higher education offering a four-year baccalaureate degree or private institution of higher education accredited by the Southern Association of Colleges and Schools offering a four-year baccalaureate degree throughout the State may conduct research, pursuant to Public Law 113-79, contingent upon funding. The institution may conduct research or pilot programs as an agricultural commodity and may work with growers located in South Carolina. Once the institution of higher education engages in research on industrial hemp, the institution shall work in conjunction with the Department of Agriculture to identify solutions for applications, applicants, and new market opportunities for industrial hemp growers. The purchaser or manufacturer will be included under the provisions of this chapter."*

The TRANSGRESSORS, who are members of an institution of higher education [Clemson University] and an institution of higher education [Clemson University] had engaged in research on industrial hemp; however, while this law states that the institution **SHALL** work "to identify solutions for applications, applicants and new market opportunities for industrial hemp growers" and "the purchaser or manufacture will be included under the provisions of this chapter", the TRANSGRESSORS refused to work with DALTON/ETW (a.k.a. Planet Energy) in the Clemson University Industrial Hemp Pilot Program under the South Carolina Industrial Hemp Program in conjunction with the South Carolina Department of Agriculture (SCDA). Thus, DALTON/ETW were prevented from free exercise and enjoyment of their civil rights granted to them under SC Title 46; Chapter 55; Section 20; Part (2) by the TRANSGRESSORS. Furthermore, "identify solutions" or identifying solutions are found by means of a research program; research programs are required by States which have hemp programs under Federal Law (2014 Farm Act). The SCDA hemp program required applicants for hemp permits for growing hemp to "identify solutions" with Clemson University [a public institute of higher learning] being that Clemson University was engaged in industrial hemp research. DALTON/ETW were a hemp permit applicant who were vertically integrated to grow hemp, manufacture hemp products, sell hemp products and purchase hemp products from other growers. Such a vertical integrated operations can have sales revenues in the tens of millions of dollars.



Moreover, The TRANSGRESSORS willfully, maliciously, and intentionally denied DALTON/ETW  
170 access to the government services of South Carolina in the SC Industrial Hemp Program.

Moreover, DALTON/ETW had an agreement with Clemson University to engage in agriculture  
economic research, and DALTON/ETW agreed to pay the asking amount for this research by  
Clemson University. This agreement was made with the agricultural side of Clemson University  
175 by the late Dr. Jeanne Briggs [Exhibit 1] for DALTON/ETW to work with Nathan Smith for an  
enterprise budget/production cost assessment which was believed to be under the Direction of  
Dr. Christopher Ray.

Dr. Christopher Ray was one of two people who were key decisions makers in the Clemson  
180 Industrial Hemp Pilot Program [CU IHPP] according to Clemson's website page about the CU  
IHPP at this time in 2017. Dr. Ray was listed at the decision maker for the agricultural side of the  
CU IHPP, and Dr. Karanfil was listed as the decision maker for the engineering side of the CU  
IHPP.

Moreover, in August 2017, DALTON/ETW initiated the "CALL FOR LETTERS OF INTENT FOR THE  
185 SC INDUSTRIAL HEMP PILOT PROGRAM RESEARCH" to science, medical, and engineering  
researchers at qualifying institutes of higher learning. Over a hundred emails were sent out  
across South Carolina.

During the entire process from beginning to when the crimes were committed, DALTON/ETW  
190 followed all pertinent Federal and State Laws. Moreover, DALTON/ETW had no interest in  
developing intellectual property with any university.

Several responses from researchers at and associated with Clemson University were received  
195 by DALTON/ETW; these researchers were from the engineering and science side of Clemson  
University and a medical program associated with Clemson University. As already noted,  
DALTON/ETW had reached an agreement for agricultural economic research with the  
agricultural side of Clemson University through Dr. Briggs who worked for Dr. Ray.

Moreover, initially DALTON/ETW had more two engineering researchers associated with CU  
who wanted to work with DALTON/ETW on their research ideas. These researchers were  
associated with Dr. Karanfil's section of the SC IHPP. So, on September 4, 2019, DALTON/ETW  
contacted the TRANSGRESSORS to meet to discuss working with these two other researchers in  
the engineering and science section of Dr. Karanfil's oversight. Specifically, Pres. Clements, Dr.  
200 Karanfil and Clemson University were sent these first couple emails with ETW d.b.a. as Planet  
Energy© in September 2017 [EXHIBIT 2]

On September 05, 2017, the TRANSGRESSOR emailed DALTON/ETW [EXHIBIT 2] informing  
DALTON/ETW that the TRANSGRESSORS would not work with DALTON/ETW in Clemson

210 University's Industrial Hemp Pilot Program [SC IHPP]. DALTON/ETW replied asking if  
DALTON/ETW was still allowed to work with the original agreement with Dr. Briggs under Dr.  
Ray on September 05, 2019; later that day the TRANSGRESSORS replied to DALTON/ETW stating  
that DALTON/ETW could not work with Dr. Briggs, Dr. Nathan Smith and Dr. Ray. The  
TRANSGRESSORS specifically contacted Dr. Ray to let Dr. Ray know that he could not work with  
215 DALTON/ETW.

DALTON/ETW emailed Dr. Karanfil asking Dr. Karanfil what the reason for not working with  
DALTON/ETW; Dr. Karanfil did not reply.

220 Next, DALTON/ETW contacted, via phone, several members of the Board of Trustees of CU. A  
few members were left messages multiple times by DALTON/ETW. A couple members spoke  
with DALTON/ETW; these members were Mr. Swann, Mr. Wilkins and Louis P. Batson, Jr.

Mr. Swann advised DALTON/ETW to speak with Dr. Karanfil to ask him what his reason for this  
225 denial was; DALTON/ETW emailed Dr. Karanfil asking him for the reason, but there was no  
response from Dr. Karanfil.

Mr. Wilkins spoke to DALTON/ETW, and then they exchanged emails [EXHIBIT 3]; Mr. Wilkins  
never provided DALTON/ETW with any return information to his inquiry.  
230

Mr. Batson told DALTON/ETW that the TRANSGRESSORS would not work with DALTON/ETW  
because DALTON/ETW would not provide a large amount of money to Clemson University from  
the DALTON/ETW research plan.

235 Ms. McAbee and Mr. Smith were left multiple messages, but they did not return  
DALTON/ETW's calls.

Next, I contacted the head of SCDA, but he was not in. He and the person in charge of the SC  
Industrial Hemp Program were out of town. The gentleman at SCDA to whom DALTON/ETW  
240 spoke said that he would make an inquiry with Clemson about this situation.

This SCDA person at the SCDA with called Dr. Ray, and then spoke to Dr. Ray about the situation  
between the TRANSGRESSORS AND DALTON/ETW.

245 Next, this person at the SCDA called DALTON/ETW to tell DALTON/ETW about what Dr. Ray told  
this gentleman at the SCDA about the situation between the TRANSGRESSORS and  
DALTON/ETW. This gentleman at the SCDA told DALTON/ETW that Dr. Ray said the decision  
not to work with DALTON/ETW came from "higher-up". Higher-up could only mean the  
Provost, President Clements, an Executive Vice President and a member or members of the

250 Board of Trustees, because at this time Dr. Karanfil and Dr. Ray were Vice Presidents. THIS  
NEEDS TO BE INVESTIGATED.

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255 But before going on, here is some background on Planet Energy© with CU Pres. Clements and  
Clemson University:

260 On November 5, 2016, Planet Energy© was first introduced to Pres. Clements, other CU  
officials, and Clemson University at an alumni event in the Chinese Embassy with the  
Chinese Ambassador to the U.S.A. in Washington, DC on the day after President Trump  
was elected. ETW's Planet Energy brochures had a description of Planet Energy and an  
investment pitch for \$10 Million [EXHIBIT 4]. Copies of Planet Energy's description and  
265 investment pitch was handed by me to Pres. Clemson who then ask me to give the  
brochures to the person whom Pres. Clements directed me to give the brochures. These  
brochures included the Planet Energy's White Tigers© theme (The White Tiger is a  
legendary Chinese creature).

270 In May 2017, my records show that I contacted Pres. Clements to find the contact CU  
person working with Duke Energy on a proposed new gas turbine cogeneration facility  
on campus; President Clements replied to DALTON/ETW. President Clements contacted  
CU EVP Brett Dalton to contact DALTON/ETW.

275 DALTON/ETW received a call from Brett Dalton who, upon Pres. Clements direction,  
wanted me to give written comments about the proposed Duke Energy cogeneration  
facility for CU. DALTON/ETW spoke to Brett, and then DALTON/ETW reviewed the Duke  
Energy's energy supply contract with Clemson University which DALTON/ETW found on  
the SC Board Public Service Commission's website. DALTON/ETW's examination of the  
280 contract found, in DALTON/ETW's opinion, some very peculiar terms of this proposed  
contract.

285 In DALTON/ETW's opinion Clemson University was accepting a very bad pricing structure  
for heat, higher costs, and a very strange pricing system. In DALTON/ETW's professional  
opinion with 30 years of electrical utility and energy experience, the pricing system was  
overcharging CU for natural gas prices; prices were based upon Henry Hub natural gas  
prices, not Appalachian natural gas prices which is the most likely source of the natural  
gas in Duke Energy's pipelines. DALTON/ETW's had serious concerns about some  
aspects of the proposed facility after DALTON/ETW'S review.



290 The Appalachian natural gas prices were typically 30% lower than Henry Hub prices.  
Moreover, DALTON/ETW believe that CU was accepting natural gas prices above market  
value, and CU was subsidizing Duke Energy's non-fixed energy prices during peak-rate  
hours. Furthermore, Duke was using turbine technology that was less in efficiency and  
higher priced than GE Jenbacher reciprocating engines.

295 The questions from DALTON/ETW was: "WHY IS CLEMSON PAYING DUKE HIGHER PRICES  
FOR HEAT WHILE SUBSIDIZING DUKE ENERGY'S PROFITS?" and "WHY ARE TURBINES  
BEING USED OVER GE JENBACKER ENGINES?" Something seems strange about this to  
DALTON/ETW.

300 DALTON/ETW was deeply concerned about what to do about what he found in the  
energy supply contract, but around the same time DALTON/ETW had to prioritize  
DALTON/ETW's time. DALTON/ETW began to prepare their application to grow hemp  
for the SC Industrial Hemp Program and to further inquire about Planet Energy's  
305 potential location at the sought-after property in Central, SC.

DALTON/ETW did not report of their findings to Brett Dalton, the financial manager of  
Clemson University because of the explained events that are described hereinafter  
pertaining to the SC Industrial Hemp Program; DALTON/ETW were concerned that there  
310 might be corruption at CU regarding the energy matters but soon DALTON/ETW  
experienced the TRANSGRESSORS' willful, malicious and intentional crimes against  
DALTON/ETW's civil rights and willful, malicious and experience intentional other  
injuries and harm to DALTON/ETW.

315 In 2017, sometime after 2016 when DALTON/ETW found, and then sought-after a  
location in Central that seemed ideal to locate Planet Energy. This property in Central  
was an estate which was owned by the former wives of a late prominent IPTAY  
supporter and good friend of INDIVIDUAL 1. At sometimes later, the realtor told  
DALTON/ETW that INDIVIDUAL 1 harvests hay or some other grain for the owner. At  
320 some point later, DALTON/ETW told the realtor that DALTON/ETW intend to grow hemp  
at this location.

In late August 2019, DALTON/ETW was given verbal permission to lease the farm to  
grow hemp and awaited to meet the owners to fill-out the proper lease forms required  
325 by SCDA's hemp permit application. The understanding between the owners and  
DALTON/ETW was that If DALTON/ETW received a permit to grow hemp then  
DALTON/ETW planned on raising money to purchase the estate for Planet Energy, as the  
property was currently for sale. Soon afterwards, a strange event happened.



330 Strangely, about one week the original due date for submission of the hemp permit applications, the 1<sup>st</sup> wife who was close to INDIVIDUAL 1 called the realtor. She told the realtor to tell DALTON/ETW that she changed her mind about leasing the property to DALTON/ETW for growing hemp.

335 A few days later, DALTON/ETW went to see INDIVIDUAL 2 at his office to inquire if INDIVIDUAL 2 has any land to lease to DALTON/ETW. To the surprise of DALTON/ETW, INDIVIDUAL 2, who successfully led the lobbied for the SC Industrial Hemp Program, told DALTON/ETW that INDIVIDUAL 2 and INDIVIDUAL 1 was submitting separate applications to grow hemp with the SCDA. (As it turned out, INDIVIDUAL 1 and  
340 INDIVIDUAL 2 did receive permits to grow hemp from the SCDA Industry Hemp Program months later.)

Soon after losing the farmland in Central, DALTON/ETW found farmland in Laurens County. This farmland was through a college roommate from Dalton's undergraduate  
345 days at Clemson University. Regardless, without Clemson University working with Planet Energy, DALTON/ETW could not submit a complete and proper hemp growing application to the SCDA. Therefore, DALTON/ETW had no possibility to obtain a permit to grow hemp by the SCDA.

350 This is not the first time that DALTON experienced wrongdoing and strange events at Clemson University. BUT, Dr. Karanfil is indirectly related to these first-time wrongdoings that DALTON experienced at CU.

In the 1990's, DALTON was employed at the Environmental Systems Engineering (ESE) Department for a period of time. *(During this same time, Dr. Karanfil was employed at*  
355 *the University of Michigan. Subsequently after Dalton was terminated at the ESE for exposing a wrongdoing to the US Department of Energy, Dr. Karanfil was employed by CU at ESE in 1996 , and then from 2008-2013 was Dr. Karanfil was the department chair of ESE. In 2014, Dr. Karanfil became the V.P of Research at CU)*

360 From 1994 to sometime in 1995, DALTON worked at Vitlab of CU's Department of Environmental Systems Engineering which was at the Linvil Rich Building. The Linvil Rich building is located at the CU Research Park in Anderson, SC; the Vitlab was in a building behind the Linvil Rich building.

365 Dalton found many strange arrangements and operations on the Federal contract that provided the funds for DALTON to work at ESE's VitLab. DALTON was responsible for all the glass processing and materials work at the Vitlab where the principal investigator had a secret agreement with their US Department of Energy contractor not to employ  
370 any ceramic engineers at the Vitlab (Robert C. Dalton is a ceramic engineer).

A particular professor person who was in charge of the Vitlab and who was DALTON's work supervisor was responsible for these strange events and activity; this particular person is now a professor emeritus, and he had an office next to Dr. Karanfil in 2017. (Environmental Systems Engineering is currently known as Environmental Engineering and Earth Science.) This particular professor person did not like Dalton.

In August 2017, this particular professor person was sent a "CALL FOR LETTERS OF INTENT FOR THE SC INDUSTRIAL HEMP PILOT PROGRAM RESEARCH" by DALTON/ETW [EXHIBIT 5].

Possibly, this particular professor person played a major role in these crimes in this complaint. This person's operation in 2017 was filled with nepotism, favoritism and, in my opinion, unethical professional behavior.

In the 1990's, Dalton reported this unethical behavior to a major project Federal Sponsor, the US Department of Energy; DALTON's actions were found to be correct, but DALTON's employment contract was terminated days later by this particular professor person who was the principle investigator on the contract and who conspired with the managing director at the VitLab of Clemson University at the Research Park in Anderson, SC. to terminate DALTON. The particular professor person could be a significant suspect in these crimes of this complaint

As describe above, three strange events a happen in the Summer of 2017:

- 1) DALTON/ETW's initial farmland site to grow hemp was taken away from DALTON/ETW, and by coincidence INDIVIDUAL 1 who applied and who was granted one of 20 original permits to grow hemp under SC Industrial Hemp Program worked for and was close friend of the owner of the farmland site;
- 2) the TRANSGRESSORS refused to work with DALTON/ETW in the SC Industrial Hemp Program as mandated by SC Law; and
- 3) In DALTON/ETW's opinion, DALTON/ETW found that CU and Duke Energy may have a strange pricing agreement that would be financially bad for CU (DALTON/ETW could be incorrect).

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Now, the complaint' main discussion of the TRANSGRESSORS actions against DALTON/ETW regarding DALTON/ETW's permit application to grow, to manufacture, to sell and to buy hemp under the SC Industrial Hemp Program continues.

EXHIBIT 2 contains a collection of emails exchanges between the TRANSGRESSORS and DALTON/ETW. These emails in EXHIBIT 2 discuss DALTON/ETW's participation in the SC Hemp program with the TRANSGRESSORS as the research institution which is required by the SC Law. At the time of this exchange, DALTON/ETW already had an agreement with the agricultural side of the CU IHPP.

The email exchange [Exhibit2] provides solid evidence that the TRANSGRESSORS would not work with DALTON/ETW as required by the SC Industrial Hemp Cultivation Law. This email exchange by the TRANSGRESSORS and DALTON/ETW is solid evidence that the TRANSGRESSORS committed the crimes as listed above in this complaint.

On September 04, 2017 [EXHIBIT 2], DALTON/ETW contacted President Clements, Dr. Karanfil and Clemson University about a meeting on September 6, 2017 to discuss the research with the engineering and science side of the CU IHPP. DALTON/ETW sent an attachment with Planet Energy's proposed hemp assay which would be a small part of the other 18 hemp acres which would be used to grow the highest value hemp product, CBD's, under a CU research program for an economic study by Dr. Nathan Smith which was under the oversight of Dr. Christopher Ray on the agricultural side of CU and managed by Dr. Jeanne Briggs [EXHIBIT 1].

CBD tincture products were selling for the equivalent of between \$80,000 and \$139,000 per kg CBD, and DALTON/ETW intended use the enormous profits from DALTON/ETW internet retail sales and wholesale of CBD products to fund the research, development and commercialization of other energy programs at Planet Energy© and to promote the Appalachian Energy Project© [APPENDIX A].

Moreover, an ADDITIONAL SEVEN (7) Clemson University RESEARCHERS at CU reached out to DALTON/ETW to work with DALTON/ETW'S Planet Energy at a later day, and this date was before the final deadline for submitting a permit application to the SCDA. BUT, these seven researchers were not allowed to work with DALTON/ETW according to the TRANSGRESSORS.

The seven researchers were very accomplished professionals. One of these seven CU researchers was a Senior Researcher and Engineer at the United States Department of Agriculture (USDA) and adjunct professor at CU. The remaining six individuals are an entrepreneur in bioenergy and bio-coproducts, a CU professor in Biosystems Engineering, a CU Assistant Professor in Biosystems Engineering, a CU Assistant Professor in Environmental Systems and Engineering, a CU Coordinator of Integrated Pest Management and Sustainable Agriculture Programs, and an Associate Professor in Biosystems Engineering [EXHIBIT 6].

In September 2017, the DALTON/ETW permit application was sent to SCDA without the needed agreements with CU; This lack of research agreement with CU prevented DALTON/ETW from obtaining a permit to grow hemp in South Carolina's Industrial Hemp Program. DALTON/ETW



withheld information on the 20-acre of farmland in Laurens County to be farm with hemp, DALTON/ETW's full confidential research plan and full confidential business plan, and did not use the two available South Carolina residents who would have signed the application; without the involvement with one to ten of the Clemson University's researchers and without a Clemson University research agreement with the CU IHPP, DALTON/ ETW could not submit a proper permit for DALTON/ETW's vertical operation to grow hemp, to extract and manufacture CBD products, to market wholesale and internet retail sales of CBD, and to research hemp species and products. Therefore DALTON/ETW had no ability to receive a permit to grow hemp by the SCDA, and the TRANSGRESSORS caused DALTON willful, intentional and malicious injury and harm to DALTON/ETW. Hence, DALTON/ETW lost their ability to establish Planet Energy in South Carolina, lost their funding source to develop the Appalachian Energy Project, and lost substantial revenues from the sales of CBD products from 18 acres of hemp containing high levels (10-12%) of CBD, terpenes and other cannabinoids. The profits to DALTON/ETW'S retail value of these CBD product sales are between \$43 million and \$63 million.

Therefore, DALTON/ETW withheld any proprietary, confidential, and privileged information from being disclosed in their hemp permit application to SCDA; The malicious and corrupt actions by the TRANSGRESSORS caused DALTON/ETW to withhold such.

Robert C. Dalton and ESTEC Technology Works, LLC were harmed and injured by the actions of the Transgressors and, possibly by the Others. The actions of the TRANSGRESSORS were with intent being false with respect to the requirements of the SC Hemp Law and were malicious and intentional actions towards Robert Carl Dalton and ESTEC Technology Works, LLC.

The wrongful and willful actions by the Transgressors intended to injure Robert C. Dalton and ESTEC Technology Works, LLC to cause harm to Robert Carl Dalton and ESTEC Technology Works. DALTON/ETW were harmed and injured by these actions

The willful and wrongful conduct by the TRANSGRESSORS were motivated primarily by unreasonable financial gain because Mr. Baston, a CU Board of Trustees member, told DALTON/ETW that the TRANSGRESSORS would not work with DALTON/ETW because DALTON/ETW would not and could not provide much money to Clemson University from DALTON/ETW's research plan. The DALTON/ETW research plan provided very little monies to the CU IHPP because the Clemson University clearly stated that "At present, there are no Clemson PSA researchers with experience in the production of hemp" and, likewise, those Clemson researchers who worked outside of the PSA in the science and engineering departments of CU did not have experience either. It was the intent of DALTON/ESTC during the proposed first year of the working with the CU researchers that the time spent the first year was a learning time for future work in the relationship with the CU IHPP. There were other possible conflicts:



Planet Energy of DALTON/ETW was in direct competition with CU and CU research parks for research and commercialization funding of innovations. Many of Planet Energy's areas of research for hemp were in direct competition for energy, biofuel, and materials work that were being researched at CU research parks which include ICAR in Greenville, Clemson's Innovation Campus and Technology Park in Anderson, and the Restoration Center in Charleston, SC. The Competition by Planet Energy also affected other Clemson Research Centers which are directly associated with energy: SCE&G Innovation Center, the Duke Energy Innovation Center and the Duke Energy's eGRID as well as many other of CU's corporate research partners in these areas. Duke Energy Innovation Center is a joint venture between Clemson University and the South Carolina Research Authority (SCRA). Oddly, the TRANSGRESSORS never mention to these places to DALTON/ETW or asked DALTON/ETW (Planet Energy) to participate at these CU research centers and parks. See SC State mandate of SC Code Section 59-119-160 (4)(a).

The TRANSGRESSORS understood that their unreasonably dangerous nature of their harmful conduct, together with the high likelihood that DALTON/ETW would be harmed and injured as a result from the TRANSGRESSORS' conduct, and the TRANSGRESSORS' actions toward DALTON/ETW were known and approved by the CU President, CU Officers, and other CUs person responsible for making policy decisions on behalf of the TRANSGRESSORS.

Furthermore, the TRANSGRESSORS' actions could subject the TRANSGRESSORS to convictions of felonies, and the TRANSGRESSORS' acts and course of conduct are proximate causes of the damage, injury, harm and insult to DALTON/ETW.

Other related actions by the TRANSGRESSORS were insulting to DALTON/ETW. Subsequent to the 2017 permit application extended deadline by the SCDA, CU's Webpage for the CU IHPP incorporated a very large amount of ETW's areas or proposed research in ETW's "CALL FOR LETTERS OF INTENT FOR THE SC INDUSTRIAL HEMP PILOT PROGRAM RESEARCH" solicitation.

Other actions by James T. Clements were very disturbing to DALTON/ETW. DALTON/ETW disclosed to James T. Clement that DALTON was disabled for a traumatic brain injury (TBI). Mr. Clements did not respond to Mr. Dalton's request for an explanation as to why the TRANSGRESSORS would not work with DALTON/ETW. The American with Disabilities Act requires that public entities, such as CU, have a Communication Standard for Disabilities. There is a strong likelihood that the TRANSGRESSORS do not have a written Communication Standard for communication with someone with a moderate to severe TBI; A communication standard for the TBI disability would include that a reasonable answer be given to the individual who has a TBI. Moreover, Mr. Clements actions in this matter is concerning because Mr. Clements has a child with an intellectual disability but Mr. Clements treats Mr. Dalton who has an intellectual disability poorly and further violates Mr. Dalton's civil rights, if the TRANSGRESSORS do not have a Communication Standard for someone with a TBI.

**2. South Carolina Code 16-5-20 Punishment for Additional Crimes**

*"If in violating any of the provisions of Sections 16-5-10 or 16-5-50 any other crime, misdemeanor or felony shall be committed, the offender or offenders shall, on conviction thereof, be subjected to such punishment for the same as is attached to such crime, misdemeanor and felony by the existing laws of this State"*

The TRANSGRESSORS are believed to have committed other felonies: South Carolina Code 16-7-150 Slander and Libel, SECTION 16-11-510 Malicious Injury to Animals and Other Personal Property, and SECTION 16-17-410 Conspiracy.

**3. South Carolina Code 16-7-150 Slander and Libel**

*"Any person who shall with malicious intent originate, utter, circulate or publish any false statement or matter concerning another the effect of which shall tend to injure such person in his character or reputation shall be guilty of a misdemeanor and, upon conviction therefore, be subject to punishment by fine not to exceed five thousand dollars or by imprisonment for a term not exceeding one year, or by both fine and imprisonment, in the discretion of the court; provided, that nothing herein shall be construed to abridge any right any person may have by way of an action for damages for libel or slander under the existing law."*

By Slander and Libel, the TRANSGRESSORS originated, uttered and circulated and published with malicious intent false statements about and false matters concerning DALTON/ETW. This crime was evident in the email trail in Exhibit 2 and other emails. The TRANSGRESSOR knowingly, willfully and intentionally injured DALTON/ETW. The injury included injury to the reputations, the characters, the ability to create Planet Energy, and to the ability to have financial gain of DALTON/ETW.

The false statement and false matter are intrinsically false to the law which that false statement and that false matter relates to the committed crime of South Carolina Code 16-5-10 Conspiracy Against Civil Rights and the violation of civil rights of Section 46-55-20 "Industrial Hemp Program; research; permits; regulations"; Part(2) against DALTON/ETW by the TRANSGRESSORS. The false matter is false affair, false state and false situation regarding said laws.

**4. SECTION 16-11-510 Malicious Injury to Animals and Other Personal Property**

*(A) It is unlawful for a person to willfully and maliciously cut, shoot, maim, wound, or otherwise injure or destroy any horse, mule, cattle, hog, sheep, goat, or any other kind, class, article, or description of personal property, or the goods and chattels of another.*

575 The TRANSGRESSORS willfully and maliciously injured the property of Dalton/ETW by refusing  
to follow the law which allowed for DALTON/ETW to file a proper permit application to grow, to  
extract CBD, terpenes and other cannabinoids, to manufacture products from these extracts,  
and to market these said products in a wholesale and internet retail sales factions. The willful  
and malicious injury decreased the value of ESTEC Technology Works, LLC, the property of  
580 Robert C. Dalton. Also, the TRANSGRESSORS willfully and maliciously injured the value by  
ruining the reputation of ESTEC Technology Works, LLC and the U.S. patents of Robert C.  
Dalton. Furthermore, the TRANSGRESSORS willfully and maliciously injured and destroy the  
DALTON/ETW application to grow hemp under the SCDA. The TRANSGRESSORS willfully and  
maliciously injured the reputation and consulting value of DALTON/ETW.

585  
**5. SECTION 16-17-410 Conspiracy**

The common law crime known as "conspiracy" is defined as a combination between two or  
more persons for the purpose of accomplishing an unlawful object or lawful object by unlawful  
means.

590 The TRANSGRESSORS banded together for the purpose of accomplishing an unlawful object  
which was maliciously and willful injured the property of DALTON/ETW. The TRANSGRESSORS  
banded together for the purpose of accomplishing an unlawful object which to was deny  
DALTON/ETW the right to work with a qualified university pilot program for hemp research as  
595 required under the SC Law.

The TRANSGRESSORS banded together to accomplish a lawful object by unlawful means by  
eliminated the competition for private and public funding by DALTON/ETW's Planet Energy, a  
research park, to the Research Parks and Research Programs of Clemson University.

600 The TRANSGRESSORS banded together to self-enrich themselves by a lawful object by unlawful  
means by denying DALTON/ETW the capability to compete for a license to grow hemp and use  
the profits from growing hemp and selling CBD product which allowed for the growth of Planet  
Energy, thereby effectively eliminating the TRANSGRESSORS a local competitor for private and  
public funds and investment thereby increasing the TRANSGRESSORS ability to meet goals so the  
TRANSGRESSORS can get bonuses and other financial and professional gains for themselves.

605 **DAMAGES SOUGHT**

The Plaintiff seeks damages. The Plaintiff seeks actual damages, non-economic damages and  
prays for punitive damages (While the Plaintiff is a Christian, the Plaintiff believes that pray for  
punitive damage instead of seek an amount of punitive damages is a violation by the State of  
the Plaintiff's Civil Rights under the first Amendment of the U.S Constitution; the freedom of  
610 speech, freedom of expression, and the freedom of religions of the Plaintiff is violated.



Furthermore, the State of South Carolina violates the commerce clause of the U.S. Constitution by controls the right of the 1<sup>st</sup> Amendment of the U.S. Constitution of individuals across state lines when having to file civil action in South Carolina.)

The Plaintiff seeks actual damages of \$62 million dollars. See Appendix 1 in this document for how the actual damages were calculated.

The Plaintiff seeks non-economic damages of \$25 million dollars for pain, suffering, inconvenience, mental anguish, loss of enjoyment of life, injury to reputation, humiliation, fear of loss property value, fear of loss investment, fear of loss funding, and fear of loss of future employment of services. The TRANSGRESSORS were negligent in their duties to the State and to Clemson University, their employers. DALTON/ETW was injured and harmed by the willful, intentional and malicious actions and activity of the Transgressors.


Some of these damages are non-pecuniary; Some of these damages are pecuniary.

The amount of damage sought for total damages is the sum of \$87 million dollar plus the Plaintiff prays for \$10 Million in punitive damages.

I believe and declare under penalty of perjury that the foregoing is true and correct

Signed this 05 day of September, 2019

Signature of Plaintiff:

  
Robert Carl Dalton, pro se

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APPENDIX 1

APPENDIX A: Yield and Value of Hemp Plants  
and  
CBD Products.

In the hemp industry, two measurement systems of weight are used; the English system and Metric system.

The English System of weight measure (pounds, lbs.) is used to measure the weight of harvested raw hemp plants as well as harvested hemp flower and leaves; the hemp plant material is valued in dollars per pound (\$/lb) where this value is based upon the quality of the plant material and the CBD content of the plant material.

The Metric System is used to measure the weight of CBD, and the value of the CBD is express as dollars per kilogram (\$/kg) or dollars per gram (\$/gm). CBD have a significant value especially in the retail market.

As the Hemp CBD industry has developed, CBD and its natural form, CBDA, have gotten attention. CBDA is found in the hemp plant and is the acid form of CBD. CBD is produced by heating CBDA to decarboxylate CBDA. CBDA has been found to be more bioactive than CBD. So, the CBD Hemp market has transformed into an industry resolving the question of which CBD and CBDA products are desired by the marketplace. Another important chemical species in the hemp plant is terpenes. Terpenes are what expresses to these senses as the bouquet (or what one smells) of the hemp plant species. Proper methods of extraction will extract CBDA, CBD and terpenes. The quantity of each extracted species is dependent upon the extraction method.

Collectively, in the explanation of value, value is based upon Hemp CBD which is included what is know as "full spectrum CBD". Full spectrum CBD isolate is an isolate that contains CBDA, CBD, terpenes and other cannabinoids. As the hemp industry progresses and evolves, the quality measurements of the "Full Spectrum CBD" isolate will develop. In the meantime, the value of CBD will be based upon published values and retail prices.

Generally, the Hemp CBD industry has 3 or 4 tiers of the product. These tiers represent the harvest plant material to the retail product. The explanation is meant to provide a general overview of the industry and how value is created.

**TIER 1** Tier 1 of product is CBD in the form of CBDA with terpenes and other cannabinoids in the plant material itself. The weight percentage the collective extracted chemical species (the CBDA, CBA, terpenes and other cannabinoids) in the plant and the quality of the plant materials determines the value of the plant material. The value can range from \$10/lb to \$100/lb depending on market value and plant material quality.

**TIER 2** Tier 2 of product is the extracted CBD isolate. CBD is extracted from the plant materials by a variety of methods. Currently, the most popular methods have been

ethanol extraction and CO2 extraction. Other extraction methods include butane extraction, oil extraction, cold water extraction, and extraction by hydrocarbon mixtures. (In some products, the CBDA and terpenes are not extracted but utilized by chopping the plant flower and the leaves associated with the flower into a fine size.) The value of Tier 2 products be \$10,000/kg or higher depending upon market conditions.

**TIER 3** Tier 3 of product is the refined Tier 2 products which is incorporated into a Tier 3 product. Tier 3 products includes tinctures, capsules, creams, etc. Tier 3 products can be sold wholesale or by internet sales at retail prices. Usually, Tier 3 products are sold by the milligram of CBD (or full spectrum CBD isolate) in the product. In 2016 and 2017, the prices for a 1000 mg CBD product at a retail store at the kg-price-equivalent ranged from of \$90,000/kg to \$135,000/kg; The prices for the wholesale-price-equivalent is about 50% of the retail (keystone price), and sometime the wholesale price could be higher than 50%; the wholesale prices of Tier 3 products ranged from of \$45,000/kg to \$62,500/kg.

**TIER 4** Tier 4 of product is the retail sales of the Tier 3 products at brick & mortar stores or over-the-counter sales. In 2016 and 2017, the retail-price-equivalent for a 1000 mg CBD product at a retail store ranged from \$90/1000 mg to \$135/1000 mg or, at the kg-price-equivalent, the retail prices ranged from of \$90,000/kg to \$135,000/kg.

The acreage value of products of Planet Energy at these Tier level can be calculated; the Planet Energy value would have been in the millions of dollars even tens of millions of dollars.

Unless one believes that the God has made individuals in South Carolina to be stupid, otherwise only corruption, avarice and poor management can explain the poor success of the hemp industry in South Carolina during its first two years of existence. I do not believe that God individuals in South Carolina as brilliant as any of his children anywhere.

The calculated value of Planet Energy total actual damages is \$64 Million. The value of the non-economic damages is \$25 Million. And Punitive Damages are prayed for.

The total damages are \$89 million and Punitive Damages are prayed for. The plaintiffs pray for punitive damages.

See Appendix A1 for the Calculated Value of Hemp to ESTEC Technology Works, LLC (d.b.a. Planet Energy and 100% owned by Robert C. Dalton)

**APPENDIX A1: ACTUAL DAMAGES**



## Potential Yields and Values of Hemp plants for CBD, CBD Isolate, CBD products

4 foot center to center plants			Yield of Plant Mass for CBD and Yield of CBD Isolate.										
		CBD Hemp Product Yields						CBD Hemp Product Value					
plants per acre	yield per plant (gms)	CBD Plant Material yield (lb)/acre	CBD Plant Material yield (lb)/18acres	Pure CBD (kg)/acre	Pure CBD (kg)/18acres	Plant Value/acre	Plant Value/ 18acres	CBD Isolate/acre	CBD Isolate/18 acres	# of 1000mg product	33% profit margin		
# of plants	2722	340	2039							at 89/1000 mg			
adj. # of plants	2500	313	1877	33786	75.68	1362.19	46925 \$	844,650.00	\$ 756,772.27	\$ 13,621,900.91	122,597,106.18 \$	46,467,046.70	
% poss. Plants	0.00						93850 \$	1,689,300.00		at 139/1000mg			
										\$	189,344,422.04	\$ 62,883,858.67	
	0.920588235			312.9867582									
		0.920549289											
	1877.079412												